



United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

July 22, 2025

VIA ECF

Honorable Arun Subramanian
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

**Re: *American Federation of Teachers, AFL-CIO, et al. v. Goldstein, et al.*,
No. 25 Civ. 03072 (AS)**

Dear Judge Subramanian:

This Office represents Anna Davis, in her official capacity as Agency Head – General Counsel Performing the Duties of the Director of the Federal Mediation and Conciliation Service (“FMCS”), the United States of America, the United States Office of Management and Budget (“OMB”), and Russell T. Vought, in his official capacity as the Director of the OMB (collectively, the “Government”) in the above-referenced action. [We write respectfully to request a four-day extension of time, from July 28, 2025, to August 1, 2025, for the Government to submit its reply brief in support of its motion to dismiss, or alternatively, for summary judgment.](#)

Plaintiffs’ counsel submitted their brief and seven declarations in the late afternoon on Friday, July 18, 2025, and the Government’s reply brief is currently due 6 business days later, on July 28, 2025. The Government requests additional time due to the press of business, including, among other things, a response to a complaint due yesterday and a deposition scheduled for this week, and the need to circulate the Government’s brief among the relevant agencies for review before filing. This is the Government’s first request for an extension of time to submit its reply brief. Plaintiffs consent to this request.

We also write to advise the Court that the Government is available for oral argument any day prior to August 16, or after September 1 (Labor Day).

We thank the Court for its consideration of this request.

SO ORDERED.

Respectfully submitted,

JAY CLAYTON
United States Attorney

Arun Subramanian, U.S.D.J.
Date: July 22, 2025

By: /s/ Lawrence H. Fogelman
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(VIA ECF)